

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: Mark Guy Jeune and Jolene Marie
Jeune

Debtor

Ronda J. Winnecour, Chapter 13 Trustee
Movant

v.
Planet Home Lending, LLC
Mark Guy Jeune and Jolene Marie
Jeune

Respondents

Bankruptcy No. 19-23512-JAD
Chapter 13

**RESPONSE TO TRUSTEE'S INTERIM NOTICE OF CURE OF ARREARS
DATED April 22, 2021**

Respondent, Planet Home Lending, LLC, (hereinafter "Respondent"), by and through its attorney Lauren M. Moyer, Esquire, and McCabe, Weisberg & Conway, LLC, hereby responds to Trustee's Interim Notice of Cure of Arrears dated April 22, 2021 as follows:

1) Respondent agrees that the prepetition arrears in the amount of \$3,123.54 have been paid in full.

Dated: 05/10/2021

Respectfully submitted,
McCABE, WEISBERG & CONWAY, P.C.

/s/ Lauren M Moyer, Esquire
Lauren M. Moyer, Esquire I.D. #
Attorney for Planet Home Lending, LLC
123 South Broad Street, Suite 1400
Philadelphia, PA 19109
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CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of Response to Trustee's Interim Notice of Cure of Arrears on the parties listed below, by electronic means or regular United States mail, postage prepaid, addressed as follows:

Ronda J. Winnecour
Chapter 13 Standing Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, Pennsylvania 15219
cmecf@chapter13trusteedpa.com
Via ECF

Aurellius P. Robleto
Robleto Kuruco, PLLC
6101 Penn Avenue
Suite 1306
Pittsburgh, PA 15206

Mark Guy Jeune
5511 Century Ave
Pittsburgh, PA 15027-2331
Via United States Mail

Jolene Marie Jeune
5511 Century Ave
Pittsburgh, PA 15027-2331
Via United States Mail

Dated: 05/10/2021

Respectfully submitted,
McCABE, WEISBERG & CONWAY, P.C.

/s/ Lauren M. Moyer, Esquire
Lauren M. Moyer, ESQUIRE, I.D. #
Attorney for Planet Home Lending, LLC
123 South Broad Street, Suite 1400
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